

UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY
Albert Russo PO Box 4853 Trenton, NJ 08650 (609) 587-6888 Standing Chapter 13 Trustee
In re:
Michael A. Ferguson Theresa Sertich
Debtor(s)

Case No.: 21-12573 / MBK

Chapter 13

Hearing Date: 6/8/2022 at 9:00 AM

Judge: Michael B. Kaplan

**TRUSTEE'S OBJECTION TO DEBTORS' MOTION TO MODIFY CHAPTER 13 PLAN**

Albert Russo, the Standing Chapter 13 Trustee, hereby objects to for the following reasons:

1. The proper procedure for the relief the debtors seek is by filing a Modified Plan on notice to all creditors.
2. The Debtors' plan must remain 100% based upon the debtors' ownership interest in five parcels of real estate with varying amounts of equity.

Dated: June 01, 2022

/s/ Albert Russo

Albert Russo, Standing Chapter 13 Trustee  
By: David Martin, Staff Attorney